

JASON M. FRIERSON
United States Attorney
District of Nevada
Nevada Bar Number 7709

SKYLER H. PEARSON
Assistant United States Attorney
501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336
skyler.pearson@usdoj.gov

Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Gabriela Salas and Juan Carlos Salas Flores,
Plaintiffs,
v.

Loren K. Miller, Director, Nebraska Service Center, U.S. Citizenship and Immigration Services, in his official capacity as well as his successors and assigns; Alejandro Mayorkas, Secretary, U.S. Department of Homeland Security, in his official capacity as well as his successors and assigns; Ur Mendoza Jaddou, Director of U.S. Citizenship and Immigration Services, in her official capacity as well as her successor and assigns; Antony J. Blinken, Secretary of State, U.S. Department of State, in his official capacity as well as his successors and assigns; Phillip Slattery, Director National Visa Center, U.S. Department of State, in his official capacity as well as his successors and assigns; Richard C. Visek, Acting Legal Advisor, U.S. Department of State, in his official capacity as well as his successors and assigns;

Defendants.

Case No. 2:22-cv-02183-APG-EJY

Stipulation to Extend Deadline for Defendants to File a Responsive Pleading

(Second Request)

Plaintiffs, Gabriela Salas and Juan Carlos Salas Flores, and the United States of America, on behalf of Federal Defendants, through counsel, hereby stipulate and jointly move the Court to extend the time for Federal Defendants to file an answer or other

1 responsive pleading to Plaintiffs' complaint by 60 days. This request is based on the
2 following:

3 1. On December 30, 2022, Plaintiffs filed their complaint (ECF No. 1).
4 Plaintiffs request, among other relief, that the Court “[c]ompel Defendants to complete the
5 background checks for and adjudication of Plaintiff-husband’s I-601A application and
6 scheduling of Plaintiff-husband’s DS-260 immigrant visa interview.” (ECF No. 1 at 12–13).

7 2. The parties previously entered into a stipulation (ECF No. 10) to extend the
8 deadline for Federal Defendants to answer or otherwise plead to April 3, 2023. The Court
9 granted the stipulation (ECF No. 11).

10 3. Since the filing of the complaint, USCIS approved Plaintiff’s I-601A
11 application.

12 4. The agency plans to take further action in the future. The granting of the
13 application and upcoming agency actions may resolve some, or all, of the issues raised in
14 Plaintiffs’ complaint.

15 //

16 //

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //

5. Accordingly, the parties request that the Court extend the time for Federal Defendants to answer or otherwise plead by another 60 days. Federal Defendants responsive pleading would then be filed on or before **August 14, 2023**, which is the first weekday 60 days from the current responsive deadline.

Respectfully submitted this 13th day of June 2023.

QUIROGA LAW OFFICE, PLLC

JASON M. FRIERSON
United States Attorney

/s/ Maria E. Quiroga
MARIA E. QUIROGA, ESQ.

Attorney for Plaintiff

/s/ Skyler H. Pearson
SKYLER H. PEARSON
Assistant United States Attorney

Attorneys for Federal Defendants

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: June 15, 2023